

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GUSTAVO DIAZ, JOSEPH SANTOS,
CHRISTIAN A. GIBSON, GERALD
SINCLAIR, MARVIN LEON VEAL, AND
DOMENICK SCORZIELLO, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

FCA US LLC,

Defendants.

Case No.

DECLARATION OF JOSEPH SANTOS

I, Joseph Santos, declare under penalty of perjury as follows:

1. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial by jury of all issues in this action so triable.

2. I make this declaration based upon my personal knowledge except as to those matters stated herein that are based upon information and belief, and as to those matters, I believe them to be true. I am over the age of eighteen, a citizen of the State of California, and a Plaintiff in this action.

3. Pursuant to California Civil Code §1780(d), this Declaration is submitted in support of Plaintiffs' Selection of Venue for the Trial of Plaintiffs' Cause of Action alleging violation of California's Consumers Legal Remedies Act.

4. I reside in El Sobrante, California, which is in the County of Contra Costa.

5. I purchased my 2016 Dodge Charger Hellcat, which is the subject of this action, new from Hilltop Chrysler Jeep Dodge Ram, an FCA authorized dealership in Richmond, California.


6. I understand that Defendant FCA US LLC is a limited liability company organized and in existence under the laws of the State of Delaware.

7. Based on the facts set forth herein, this Court is a proper venue for the prosecution of Plaintiffs' Cause of Action alleging violation of California's Consumers Legal Remedies Act as a substantial portion of the events giving rise to my claims occurred here.

8. I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct.

2021-06-24 10:07:26 (UTC-07:00)

Executed on _____, in El Sobrante, California.



Joseph Santos